

KEKER, VAN NEST & PETERS LLP
BENJAMIN BERKOWITZ - # 244441
bberkowitz@keker.com
MATAN SHACHAM - # 262348
mshacham@keker.com
CHRISTINA LEE - # 314339
clee@keker.com
SPENCER MCMANUS - # 322824
smcmanus@keker.com
LIAM BROWN - # 347518
liambrown@keker.com
633 Battery Street
San Francisco, CA 94111-1809
Telephone: 415 391 5400
Facsimile: 415 397 7188

Attorneys for Defendant
LINKEDIN CORPORATION

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JANE DOE, individually and on behalf of all others similarly situated,

Plaintiff,

V.

LINKEDIN CORPORATION and GOOGLE LLC,

Defendants.

Case No. 5:25-cv-03737-EJD

**STIPULATION AND ~~PROPOSED~~
ORDER CONSOLIDATING CASES**

CYNTHIA HAYS, on behalf of herself and all others similarly situated.

Plaintiff.

V

LINKEDIN CORPORATION.

Defendant.

5

Case No. 3:25-cv-04181-EJD

STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES
Case No. 5:25-cv-03737-EJD

1 Pursuant to Federal Rule of Civil Procedure 42(a), Plaintiffs Jane Doe and Cynthia Hays
 2 (“Plaintiffs”) and Defendant LinkedIn Corporation (“LinkedIn”) jointly request that the above-
 3 captioned actions (the “Actions”) be consolidated for all pretrial and trial proceedings. Plaintiffs
 4 and LinkedIn, by and through their undersigned counsel, stipulate as follows:

5 WHEREAS, on April 29, 2025, Plaintiff Doe filed a Complaint against LinkedIn and
 6 Google LLC in *Doe v. LinkedIn Corporation*, No. 5:25-cv-03737-EJD (N.D. Cal.) (“Doe”);

7 WHEREAS, on May 15, 2025, Plaintiff Hays filed a Complaint against LinkedIn in *Hays*
 8 v. *LinkedIn Corporation*, Case No. ⁵3:25-cv-04181-EJD (N.D. Cal.) (“Hays”);

9 WHEREAS, on June 2, 2025, LinkedIn filed an Administrative Motion to Consider
 10 Whether Cases Should Be Related regarding *Doe* and *Hays* (*Doe*, Dkt. 19);

11 WHEREAS, on June 2, 2025, this Court granted the motion and ordered the Clerk to
 12 relate the later-filed *Hays* to *Doe* (*Doe*, Dkt. 21);

13 WHEREAS, Plaintiffs and LinkedIn agree that consolidation of the Actions will advance
 14 the just and efficient progress of this litigation, reduce case duplication, conserve Court and party
 15 time and resources, avoid the need to contact parties and witnesses for multiple proceedings, and
 16 minimize the expenditure of time and money for all parties involved. *See* Fed. R. Civ. P. 42(a);

17 WHEREAS, Plaintiffs and LinkedIn agree that Plaintiffs’ counsel in *Doe* and *Hays* will
 18 confer and file a superseding Consolidated Class Action Complaint,

19 WHEREAS, Plaintiffs and LinkedIn agree to set a deadline for LinkedIn to respond to the
 20 Consolidated Class Action Complaint;

21 WHEREAS, Plaintiffs and LinkedIn agree that all pending schedules, hearings, deadlines,
 22 or dates in the separate *Doe* and *Hays* actions should be taken off-calendar in light of
 23 consolidation, to be reset following resolution of LinkedIn’s anticipated motion to dismiss the
 24 Consolidated Class Action Complaint;

25 WHEREAS, by stipulating to consolidation of the Actions, LinkedIn does not concede the
 26 plausibility or truth of any of Plaintiffs’ allegations or that certification of the putative classes is
 27 proper under Federal Rules of Civil Procedure 12 or 23 and specifically reserves its right to move
 28 to dismiss and/or oppose class certification on all available grounds;

1 WHEREAS, Plaintiffs have represented that the consolidated complaint will not contain
 2 allegations against Google and on that basis Google does not oppose the request relief;

3 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between
 4 Plaintiffs and LinkedIn, through their undersigned counsel, and subject to the Court's approval:

5 1. The Actions shall be consolidated for all purposes under Federal Rule of Civil
 6 Procedure 42(a) into the "Consolidated Action." An original copy of this Order shall be filed by
 7 the Clerk in each of the consolidated cases.

8 2. All papers to be filed in the Consolidated Action shall be filed on the *Doe* docket.
 9 The case file for the Consolidated Action will be maintained under the *Doe* case number, 5:25-cv-
 10 03737-EJD.

11 3. The *Hays* action shall be closed in accordance with the regular procedures of the
 12 Clerk of this court. All papers previously filed and served to date in *Hays* are part of the record in
 13 the Consolidated Action.

14 4. The Consolidated Action shall remain related to *L.B. v. LinkedIn Corporation*, No.
 15 5:24-cv-06832-EJD (N.D. Cal.), which is also related to *J.S. v. LinkedIn Corporation et al.*, No.
 16 5:24-cv-07374-EJD (N.D. Cal.); *V.R. v. LinkedIn Corporation*, No. 5:24-cv-07399-EJD (N.D.
 17 Cal.); *J.P. v. LinkedIn Corporation*, No. 5:24-cv-07586-EJD (N.D. Cal.); and *L.W.A. v. LinkedIn*
 18 *Corporation*, No. 5:24-cv-08437-EJD (N.D. Cal.). *See Doe*, Dkt. 10.

19 5. Each attorney who has already made an appearance or been admitted *pro hac vice*
 20 in *Doe* or *Hays* shall be deemed to have appeared in the Consolidated Action. Counsel who have
 21 not yet entered an appearance shall file a Notice of Appearance or motion to appear *pro hac vice*
 22 on the docket in the Consolidated Action.

23 6. All pending schedules, hearings, deadlines, or dates in the separate *Doe* and *Hays*
 24 actions shall be vacated. This includes but is not limited to (1) the deadlines for LinkedIn to
 25 respond to the separate complaints in *Doe* and *Hays*; (2) the case management conferences in *Doe*
 26 and *Hays*; and (3) all deadlines related to the case management conferences in *Doe* and *Hays*
 27 (including the deadlines to conduct the Rule 26(f) conference, file the ADR certification, serve
 28 initial disclosures, and file a joint case management conference statement). The case

1 management conference in the Consolidated Action shall be reset following a ruling on
 2 LinkedIn's anticipated motion to dismiss the Consolidated Class Action Complaint. All
 3 deadlines related to the case management conference, including the deadlines to conduct the Rule
 4 26(f) conference, file the ADR certification, serve initial disclosures, and file a joint case
 5 management conference statement, will be reset upon rescheduling the case management
 6 conference, in accordance with the Civil Local Rules and the Federal Rules of Civil Procedure.

7. Plaintiffs shall file a superseding Consolidated Class Action Complaint no later
 8 than 45 days after the date the Court approves this stipulation.

9. LinkedIn shall file its response to the Consolidated Class Action Complaint no
 10 later than 45 days after the filing of the Consolidated Class Action Complaint.

11 **IT IS SO STIPULATED.**

13 Dated: July 7, 2025

KEKER, VAN NEST & PETERS LLP

15 By: /s/ Spencer McManus
 16 BENJAMIN BERKOWITZ
 17 MATAN SHACHAM
 18 CHRISTINA LEE
 19 SPENCER MCMANUS
 20 LIAM BROWN

21 Attorneys for Defendant
 22 LINKEDIN CORPORATION

24 Dated: July 7, 2025

26 LYNCH CARPENTER, LLP

28 By: /s/ (Eddie) Jae K. Kim
 29 (Eddie) JAE K. KIM
 30 TIFFINE E. MALAMPHY

32 Attorneys for Plaintiff
 33 CYNTHIA HAYS

1 Dated: July 7, 2025

BURSOR & FISHER, P.A.

2
3 By: /s/ Joshua R. Wilner
4 L. TIMOTHY FISHER
JOSHUA R. WILNER

5 Attorneys for Plaintiff
6 JANE DOE

7 Dated: July 7, 2025

COOLEY LLP

8
9 By: /s/ Joshua D. Anderson
10 BENEDICT Y. HUR
EDUARDO E. SANTACANA
JOSHUA ANDERSON

11 Attorneys for Defendant
12 GOOGLE LLC

13
14 **SIGNATURE ATTESTATION**

15 I am the ECF user whose identification and password are being used to file the foregoing
16 Stipulation. Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this
17 document has been obtained.

18
19 KEKER, VAN NEST & PETERS LLP

20 Dated: July 7, 2025

21 /s/ Spencer McManus
Spencer McManus

22
23 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

24
25 Dated: September 30, 2025

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27
28 
Hon. Edward J. Davila
United States District Judge